

# LAW OFFICE OF BRUCE C. SAMS

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BRUCE C. SAMS

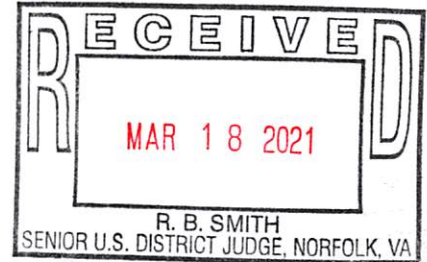
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March 18, 2021

Honorable Rebecca B. Smith, Judge  
United States District Court, EDVA  
600 Granby Street  
Norfolk, VA 23510

Re: Adonis Marquis Perry  
Case No. 2:18cr 00113



Dear Judge Smith:

I was appointed co-counsel for the above referenced defendant on March 10, 2021. I have previously advised all counsel as to my dilemma regarding scheduling a jury trial in this matter before June. My difficulties are as follows:

1. I have numerous previously scheduled court matters pending before different courts throughout the Hampton Roads area. The cases involve both criminal and civil matters in circuit and districts courts. Several of the criminal cases have been rescheduled due to court orders promulgated regarding the pandemic of which the courts have now open their dockets to hear these cases. As a result of the pandemic, a reduced number of cases are now being docketed each court day. As such, cases are being spread out to be heard on a daily basis. This is being followed in the majority of the courts.
2. Due to the pandemic restrictions, my court docket is full through the first week of June. I am in court in all but two days in April and five days in May. A number of these cases involve foster care matters. These cases must proceed with mandated federal and state time guidelines as to when hearings are to be held. The time constraints must be adhered to for funding to continue to provide services for the families as well as for services to be completed mainly by the parents. Additionally, these cases involve several attorneys (four to five) in which the hearing dates are coordinated. I also have several circuit court criminal cases which were rescheduled due to the pandemic and are now set to be heard. A number of these are for defendants who have been held in custody awaiting their trials.
3. Lastly, I do not believe I would be ready to try this case in the next two months. I met with the defendant for several hours and he brought with him approximately four hundred pages of documents which he stated was related to his case. He indicated that there were much more discovery documents including three pretrial motion transcripts. Mr. Perry stated that they should be reviewed to be use in his defense at

trial along with other discovery documents he believes are pertinent to his defense.

To date, I have not received any discovery in this matter. It is my understanding, that Attorney Trevor Robinson is in possession of certain discovery that he indicated he is in the process of reviewing at this time. I certainly would like sufficient time to acquaint myself with the discovery and evidence in the defendant's case.

Respectfully, I asked that Mr. Perry's trial be set in mid-June at the earliest. I can make myself available to do a trial by jury at that time. I have only three days that I am scheduled to be in court from the 14<sup>th</sup> to the 29<sup>th</sup> of June.

Sincerely yours,



Bruce C. Sams

Cc: Trevor J. Robinson, Esquire  
Joseph E. Depadilla,, Assistant United States Attorney